

## REMARKS

Claims 1-20 are in this application and are presented for consideration. By this Amendment, Applicant has amended claims 1-9. Applicant has also added new claims 10-20.

The drawings have been objected to because the Office Action states that there are no elements directed towards the "door inner plate 2".

Applicant assumes that the Office Action meant to state that there are no elements directed towards the "door inner plate 2'" as the drawings clearly show the door inner plate 2. However, appropriate clarification is requested. Applicant has amended the specification as shown above to delete the references made to "2' ". Accordingly, Applicant respectfully requests that the Examiner remove the objection.

The drawings have been objected to because the Office Action states that it is difficult to understand how each of the elements are connected. The Office Action further states that a cross-section view depicting the elements would help in understanding how all of the elements are interconnected.

Applicant respectfully traverses the objection. Figure 5 clearly shows the connection of the connecting plate 6 of the outer module A to the inner door plate 2 of the inner module I. Figure 5 is a cross sectional view of the connecting plate 6 connected to the inner door plate 2 at the location of reference numeral 2 shown in Figure 4. It is Applicant's position that the drawings clearly show the connection of the outer module and the inner module. Accordingly, Applicant respectfully requests that the Examiner remove the objection.

The abstract of the disclosure has been objected to because the Office Action states that

in lines 2 and 13 the phrases "for example" and "or the like" fails to describe the invention.

Applicant has amended the abstract as shown above.

Claims 1-9 have been rejected under 35 U.S.C. 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention.

Applicant has amended claim the claims paying close attention to the Examiner's remarks. Applicant wishes to thank the Examiner for the careful review of the claims. It is Applicant's position that the claims as now presented are clear and satisfy the requirements of the statute.

Claims 1-9 have been rejected under 35 U.S.C. 102(e) as being anticipated by Morrison et al. (US 6,857,688).

The present invention relates to two modules that are connected to one another to form a door for a motor vehicle. The door comprises an inner module that is connected to an outer module. The inner module has a locking plate and a door inner plate. The locking plate is connected to the door inner plate to define a window frame. The outer module has a connecting plate and a door outer plate. The door inner plate has a circumferential fixing profile for receiving a door seal. A separation line extends along a sealing plane of the door seal between the outer module and the inner module. The connecting plate engages the door inner plate along the separation line. This advantageously provides a simple and easy door connection that allows the inner and outer modules to be produced and handled separately. This advantageously allows the modules to be separately coated with lacquer and the inner

module to be separately equipped with the aggregates, such as window panes and an airbag. Once the modules have been separately manufactured, the seal is easily placed between the modules and the outer module is connected to the inner module via screws, rivets or adhesive. The door then can be precisely fitted to the vehicle body. The present invention advantageously provides an easy connection of two door pieces once the pieces have been separately coated with lacquer.

Morrison et al. discloses a door assembly 10 for use with a vehicle having a door outer structure 12. The door outer structure 12 includes an outer panel 14 and an inner panel 16 attached to the outer panel 14. The door outer structure 12 includes a lateral support 18 attached to the outer panel 14 and/or the inner panel 16. The inner panel 16 has an opening 20 for receiving the door assembly 10. The door assembly 10 includes a carrier module 22 that is attached to the door outer structure 12 and an upper trim panel arrangement 24 that is attached to the carrier module 22 and/or door outer structure 12. The carrier module 22 includes a carrier panel 26 that is adapted to be attached to the door structure 12 such that the carrier panel 26 covers the opening 20. The carrier panel 26 includes a seal 53 disposed about the outer periphery of the carrier body panel 38. The seal 53 is adapted to mate with the inner panel 16 so as to seal the carrier panel 26 against the inner panel 26 when the carrier panel is mounted to the door outer structure 12.

Morrison et al. fails to teach and fails to suggest the combination of an inner module including a door inner plate and a locking plate, wherein the door inner plate is connected to the locking plate to define a window frame. At most, Morrison et al. discloses a three piece

door construction comprising a trim panel connected to a door assembly 10 that is mounted to the door outer structure 12. Figure 2 of Morrison et al. clearly shows that the inner plate 16 defines an opening in the outer door structure 12, but does not define a window frame as claimed. In contrast to Morrison et al., the inner module of the present invention includes a locking plate and a door inner plate wherein the locking plate and the door inner plate define a window frame. Compared with the present invention, Morrison et al. merely discloses an inner lining for the lower part of the door structure 10 to which a trim panel 24 is attached, but does not disclose the defined window frame as claimed. As such, Morrison et al. fails to teach important aspects of the claimed combination.

Further, Morrison et al. does not teach or suggest a connecting plate of an outer module that engages a door inner plate of an inner module along a separation line defined by a sealing plane of a door seal. At most, Morrison et al. discloses a carrier module 22 that is connected to a carrier panel 38 which is mounted to the door outer structure 12. However, carrier body panel 38 does not engage the inner panel 16 of the door outer structure 12. Figure 3 of Morrison et al. clearly shows that the seal 53 does not engage the carrier body panel 38. In contrast to Morrison et al., the connecting plate of the present invention engages a door inner module along a separation line defined by a sealing plane of the door seal. This advantageously provides a simple connection of the two modules. This simple connection advantageously allows the modules to be separately handled. Morrison et al. fails to provide such advantages since the carrier body panel 38 does not engage the inner panel 16 along a separation line defined by a sealing plane of seal 53. As such, Morrison et al. takes a different approach and

does not suggest the features of the claimed combination. Accordingly, Applicant respectfully requests that the Examiner favorably consider claim 1 as now presented and all claims that depend thereon.

Applicant has added new claims 10-20. New independent claim 10 provides for features similar to the features provided in amended claim 1, but further provides that the connecting plate has a contour that is substantially similar to the contour of the door outer plate. Dependent claims 11-18 are based on new independent claim 10 and are similar to claims 2-9. New independent claim 19 provides for features similar to amended claim 1 but clarifies that the door seal engages the connecting plate contour, which is defined by an edge of the connecting plate. Claim 20 is based on new independent claim 19 and further clarifies the features of the invention. Applicant respectfully requests that the Examiner favorably consider new claims 10-20.

Respectfully submitted  
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Attached: Petition for Three Month Extension of Time

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SHOULD ANY OTHER FEE BE REQUIRED, THE PATENT AND TRADEMARK OFFICE  
IS HEREBY REQUESTED TO CHARGE SUCH FEE TO OUR DEPOSIT ACCOUNT 13-  
0410.